

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

) Criminal No. 1:21-CR-393 (TJM)

V.

CHRISTOPHER PENCE,

) Indictment

) Violation: 18 U.S.C. § 1958(a)
)
)
)
)[Use of a Facility of Interstate
)
Commerce in Connection with
)
Murder-For-Hire]
)
)
1 Count
)
)
County of Offense: Rensselaer

AT O'CLOCK Defendant.

THE GRAND JURY CHARGES:

COUNT 1

[Use of a Facility of Interstate Commerce in Connection with Murder-For-Hire]

From on or about July 16, 2021 through on or about August 9, 2021, in Rensselaer County in the Northern District of New York, and elsewhere, the defendant, **CHRISTOPHER PENCE**, did knowingly and intentionally use and cause another to use one or more facilities of interstate commerce, that is, a computer connected to the Internet, with the intent that two murders be committed in violation of New York and federal law, that is, the murders of Jane Doe and John Doe, individuals whose identities are known to the Grand Jury, as consideration for the receipt of, and as consideration for a promise and agreement to pay something of pecuniary value, that is, an amount of the cryptocurrency Bitcoin, in violation of Title 18, United States Code, Section 1958(a).

REDACTED

Dated: November 9, 2021

CARLA B. FREEDMAN
United States Attorney

By:

Emmet O'Hanlon
Emmet J. O'Hanlon
Assistant United States Attorney
Bar Roll No. 519779